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8		
9	UNITED STATES DISTRICT COURT	
10	NORTHERN DISTRIC	CT OF CALIFORNIA
11		
12	CALIFORNIANS FOR ALTERNATIVES TO TOXICS,	Case No. 3:24-CV-06632-SI
13		STIPULATED REQUEST FOR ORDER EXTENDING DEADLINES SET BY
14	Plaintiff,	COURT (L.R. 6-1, 6-2); [PROPOSED] ORDER
15	VS.	
16	TRAVIS MOREDA DAIRY and TRAVIS MOREDA,	[Filed concurrently with Declaration of Alexander Moore]
17	Defendants.	Assigned for all purposes to the
18		Honorable Susan Illston
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STIPULATED REQUEST FOR ORDER EXTENDING DEADLINES

STIPULATION

Pursuant to Local Rules 6-1 and 6-2, as supported by the accompanying Declaration of Alexander Moore, Plaintiff Californians for Alternatives to Toxics ("CATs") and Defendants Travis Moreda and Travis Moreda Dairy (collectively "TMD," and together with CATs, the "Parties") through undersigned counsel hereby stipulate and respectfully request that the Court extend all deadlines currently set by the Court by sixty (60) days. The Parties declare in support of this request:

WHEREAS, on November 22, 2024, the Court granted TMD's Motion to Extend Time, extending TMD's time to respond to CATs' Complaint from November 25, 2024 to December 27, 2024, and extending all deadlines set by the Court's Initial Case Management Scheduling Order and ADR Deadlines by 30 days (ECF No. 11);

WHEREAS, on January 2, 2025, the Court granted TMD's Unopposed Motion for Extension of Time to File Answer, extending TMD's time to file its Answer from December 27, 2024 to December 30, 2024 (ECF No. 15);

WHEREAS, on January 22, 2025, the Parties met and conferred pursuant to Federal Rule of Civil Procedure 26(f);

WHEREAS, also on January 22, 2025, the Parties each timely filed the ADR Certification;

WHEREAS, the Parties have engaged in settlement discussions, and CATs is preparing a settlement proposal for TMD's review; and

WHEREAS, the Parties each commit to a good-faith effort to resolve this case within 60 days to conserve the expenditure of attorneys' fees and costs in litigation, and therefore the Parties agree to seek a 60-day extension to all deadlines currently set by Court order.

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1	WHEREFORE, the Parties hereby stipulate and respectfully request that the	
2	Court extend all case deadlines as follows:	
3	(1) The deadline for the Parties to make initial disclosures will be extended	
4	from February 3, 2025 to April 4, 2025;	
5	(2) The deadline for the Parties to file their Joint Case Management Statement	
6	will be extended from February 7, 2025 to April 8, 2025; and	
7	(3) The date for the Court to hold its initial Case Management Conference will	
8	be extended from February 14, 2025 to April 18, 2025.	
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10	Respectfully submitted,	
11	Dated: January 27, 2025 KING & SPALDING LLP	
12		
13	By: <u>/s/ Alexander Moore</u> Alexander Moore	
14	Attorneys for Defendants	
15		
16	Dated: January 27, 2025 LAW OFFICE OF WILLIAM CARLON	
17	Signature authority granted via email	
18	By: /s/ William N. Carlon on 1/27/2025 William N. Carlon	
19	Attorneys for Plaintiff	
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21	PURSUANT TO STIPULATION, AND GOOD CAUSE SHOWN, IT IS SO ORDERED.	
22	ORDERED.	
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24	Dated: Honorable Susan Illston	
2526	United States District Judge	
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STIPULATED REQUEST FOR ORDER EXTENDING DEADLINES

ATTESTATION Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that all signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing. Dated: January 27, 2025 KING & SPALDING LLP By: <u>/s/ Alexander Moore</u> Alexander Moore Attorneys for Defendants